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Attorneys for Plaintiff Petter Investments, Inc. d/b/a RIVEER

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH

PETTER INVESTMENTS, INC. d/b/a
RIVEER, a Michigan corporation,

Plaintiff,

vs.

HYDRO ENGINEERING, INC., a Utah
corporation, and **CALIFORNIA**
CLEANING SYSTEMS, a California
company,

Defendants.

DECLARATION OF MARK W. FORD
REGARDING FILING UNDER SEAL

Civil Case No. 2:14-CV-00045

Honorable District Judge Dee Benson

AND RELATED COUNTERCLAIMS

I, Mark W. Ford, hereby declare under penalty of perjury that the following is true and correct:

1. I am counsel for plaintiff Petter Investments, Inc. d/b/a Riveer (“Riveer”) in the above-captioned matter.

2. I have personal knowledge of the statements forth herein and if called to testify, I would testify according to the statements set forth herein.

3. Riveer’s “Reply in Support of Plaintiff’s Motion for Reconsideration of Summary Judgment Memorandum Decision and Order (Dkt. No. 216)” (“Reply”) and exhibits A and B should be filed under seal because they contain information designated as CONFIDENTIAL INFORMATION – ATTORNEYS EYES ONLY under the Court’s Standard Protective Order.

4. Exhibit A to the Reply is a true and correct copy of excerpts from the deposition of Alan McCormick, taken December 12, 2014, which was contains attorneys eyes only information that should be filed under seal.

5. Exhibit B to the Reply is a true and correct copy of excerpts from the deposition of Robert D. Felice, taken December 11, 2014, which was contains attorneys eyes only information that should be filed under seal.

6. Pursuant to DUCivR 5-2 (e)(1)(B), and to allow non-protected material to be accessible, a redacted version of the Reply will be filed within fourteen (14) days of filing the sealed version.

EXECUTED this 12th day of March, 2015 in Salt Lake City, Utah.

By: /s/ Mark W. Ford
Mark W. Ford